

**Corporation for National and Community Service
Guidelines for Ensuring Quality of Disseminated Information
and Procedures for Correction by Affected Persons
September 23, 2002**

I. Background

Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658; hereafter referred to as Section 515) directs the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." Agencies are required to issue their own implementing guidelines within one year after OMB issued its guidelines. Section 515 also requires the agencies to include in their guidelines "administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency" under OMB and agency implementing guidelines. OMB has required agencies to prepare a draft report including their guidelines no later than May 1, 2002. The Corporation developed these draft guidelines to meet this requirement. This draft report will be posted on the Corporation's web site and a notice of the availability of this report will be published in the Federal Register.

The Corporation for National and Community Service (Corporation or agency) is a federal government corporation that, through programs of federal assistance, encourages Americans of all ages and backgrounds to engage in community-based service to meet the nation's educational, public safety, environmental, and other human needs.

II. Policy

The Corporation will undertake to ensure that the information it disseminates to the public is objective (accurate, clear, complete, and unbiased), useful, and has integrity. Additional levels of quality standards may be adopted as appropriate for specific categories of disseminated information. The Chief Information Officer (CIO) of the Corporation serves as the agency official charged with overseeing the agency's compliance with OMB guidelines for the quality of information disseminated by the Corporation.

III. Guidelines

Scope

The Corporation will review all information dissemination products for their quality (including their objectivity, utility, and integrity) before they are disseminated. The agency's pre-dissemination review and the guidelines in this document shall apply to information that the agency first disseminates on or after October 1, 2002. The agency's administrative mechanisms

for correcting information shall apply to information that the agency disseminates on or after October 1, 2002, regardless of when the agency first disseminated the information.

The Corporation is to ensure that the quality of its disseminated information, and its pre-dissemination review process, can be substantiated through documentation or other means appropriate to the information. Where a separate process exists for information that is already subject to a public comment process (such as rule making, regulation writing, etc.), these guidelines will not be applicable, unless the Corporation cannot appropriately respond to a complaint in its published response to comments for the action.

These guidelines apply to Corporation information dissemination products in all media and formats, including print, electronic, audio/visual, or some other form. Information dissemination products include books, papers, CD-ROMs, electronic documents, or other documentary material disseminated to the public by the Corporation. The guidelines apply to information disseminated by the Corporation from a web page, but they do not apply to hyperlinks from the Corporation web site to information that others disseminate. Nor do the guidelines apply to opinions if it is clear that what is being offered is someone's opinion, rather than fact or the Corporation's views. For example, the guidelines do not apply to staff working papers that are preliminary in nature and do not represent the views of the Corporation.

"Dissemination" means Corporation-initiated or sponsored distribution of information to the public. (See definition #8 on page 12.) Dissemination does not include distribution limited to government employees or Corporation contractors or grantees; intra-Corporation or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law. This definition also does not include distribution limited to correspondence with individuals or persons, and communications such as press releases, interviews, speeches, and similar statements. Also excluded from the definition are archival records, library holdings, public filings, responses to subpoenas or compulsory document productions; or documents prepared and released in the context of adjudicative processes.

Process for Ensuring Quality of Information at the Basic Standard

The section 515 guidelines issued by OMB focus primarily on the dissemination of substantive information (i.e., reports, studies, and summaries) rather than information pertaining to basic agency operations. The Corporation reviews all information dissemination products prior to dissemination and all products are expected to meet the basic quality standard (objectivity, utility, and integrity). Some evaluation and research reports disseminated by the Corporation would require a standard of quality that is higher than the "basic" standard described in the OMB guidelines.

As stated in the "Policy" section of these guidelines, the Corporation's basic quality standard for information involves objectivity, utility, and integrity. Objectivity involves two distinct elements: presentation and substance. Objective presentation means the information is presented within a proper context to ensure an accurate, clear, complete, and unbiased presentation.

Objective substance means the data, the analytical process, and the resulting reports are accurate, reliable, and unbiased. To the extent possible, and consistent with confidentiality protections, the Corporation will identify the source of disseminated information so that the public can assess whether the information is objective. The utility of information refers to its usefulness to its intended users, including the public. Integrity refers to the security of information; i.e., the protection of information from unauthorized access or revision. This helps ensure that the information is not compromised through corruption or falsification.

The Corporation's Chief Executive Officer is responsible for assuring that all disseminated information meets the basic quality standard. This responsibility is generally delegated to the Program Directors and the Director of Research and Policy Development. They are responsible for ensuring that the pre-dissemination review process is performed and documented at a level appropriate for the type of information disseminated. The costs and benefits of using a higher quality standard or a more extensive review process will be considered in deciding the appropriate level of quality for a given type of information, and the appropriate level of review and documentation.

The originating offices will utilize internal peer reviews and other review mechanisms to ensure that disseminated information is objective, unbiased, and accurate in both presentation and substance. The approval of information products prior to dissemination will be documented according to the internal procedures of the Corporation. Routing slips, clearance forms, emails, or other approval mechanisms may be used to document the approval process.

Corporation Policy No. 104, "Producing Publications and Other Printed Documents," provides for the uniform release and distribution of public information. It states that the Director of Public Affairs must approve all information produced for external audiences before issuance of the information product but does not review information for accuracy. This information includes new or revised publications and information placed on the Corporation Web site. In addition, the Office of Public Affairs reviews the information products for editorial and design integrity and consistency with Corporation policy. It ensures that the proper public is identified; the information is properly structured for the intended public; the proper medium is used; the design of printed material contributes to the communication; and an effective dissemination process is used. Office of Public Affairs maintains a current inventory of all brochures, publications, and periodicals and their related mailing lists. Office of Public Affairs and Office of General Counsel coordinate the release and distribution of information by the Corporation in a manner consistent with applicable laws, regulations, and Corporation policy.

The originating office's Program Director is responsible for ensuring the utility and integrity of information products disseminated by his or her office. Information is useful only if it can be retrieved. Therefore, the Program Director should ensure that sufficient metadata is associated with information published on the Web to facilitate the retrieval of the information by the public.

The originating office's Program Director and the Director of Public Affairs are to review information presented to the public, including information on the Corporation Web sites, on an annual basis to ensure that the information is current, timely, and correct.

Process for Ensuring Quality of Information at a Level Higher than the Basic Standard

The OMB guidelines for implementing Section 515 recognize that some government information may need to meet higher quality standards than the basic standard. The more important the information, the higher the quality standards to which it should be held. In particular, the OMB guidelines require “influential scientific, financial, or statistical information” to meet a high standard of quality. OMB defines “influential” as meaning “the agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

Some evaluation and research reports generated by the Department of Research and Policy Development may be required to meet this higher threshold of quality. The Director of Research and Policy Development will ensure that proper review procedures are followed and that the higher standards are met, where appropriate.

OMB directs agencies disseminating influential scientific, financial, or statistical information to ensure that the original or supporting data is generated, and the analytical results are developed, using sound statistical methods. Agencies must provide sufficient information about their data and methods that an independent reanalysis could be made by a qualified member of the public. This independent reanalysis should produce substantially the same results as the original research. OMB refers to this as the “reproducibility standard.” OMB requires “reproducibility” only for analytic results, not for the original data. OMB states that making the data and models publicly available assists in determining that the analytical results are capable of being substantially reproduced. The Corporation shall assure reproducibility for those kinds of original and supporting data according to commonly accepted scientific, financial, or statistical standards.

IV. Administrative Correction Mechanisms

In order to facilitate citizen review, this section establishes administrative mechanisms allowing affected persons to seek and obtain, where appropriate, timely correction of information maintained and disseminated by the Corporation. These administrative mechanisms have been designed to be flexible, appropriate to the nature and timeliness of the disseminated information, and incorporated into the Corporation’s information resources management and administrative practices.

An affected person (including a group, organization, or corporation as defined by the Paperwork Reduction Act) may request the timely correction of information disseminated by the Corporation. The term ‘affected person’ means anyone who may benefit or be harmed by the disseminated information. This includes persons who are seeking to address information about themselves or about other persons to whom they are related or associated, as well as persons who use the information.

Documents and information originated by and attributed to non-Corporation sources that are disseminated by the Corporation [but neither authored by the Corporation nor adopted as representing the Corporation’s views] are not covered by these guidelines, provided the

Corporation does not expressly rely on them. In disseminating such materials, the Corporation assumes no responsibility for their accuracy and is simply ensuring that the public can have quicker and easier access to such materials.

If an affected person believes that disseminated information is not accurate, clear, complete, or unbiased, he or she may submit a written request for correction to the CIO (including his or her designee) who will then route the request to the Director of the office that originated the subject information. The request should clearly identify the information dissemination source and the information asserted to be incorrect. The request should describe the suggested specific changes and the reasons for the changes. If the appropriate Director determines that a request does not reasonably describe the disseminated information source and the information the requester asserted to be incorrect, that Director will either advise the requester what additional information is needed to identify the particular information or otherwise state why the request is insufficient.

The Director is to respond to a request within 60 business days. When deemed to be appropriate, the Director may extend the 60-day response time for up to 30 more business days. This interim response is to indicate why more time is needed and when a response may be expected. Such circumstances may include, but are not limited to, a need to: review many records identified in a single request; consult with another Federal agency having a substantial interest in the request; or consult with two or more Corporation offices having a substantial interest in the request. The acknowledgment may contain a request for additional information needed to make a determination.

The 60-day response period described above is to begin on the day the request is received. For an improperly addressed request, the 60-day response period is to begin on the latter of the day the request is received or would have been received with the reasonable exercise of diligence by the CIO. Requests shall be made in writing. The envelope and the request both should be clearly marked "CIO Information Correction Request" and addressed to: Chief Information Officer, Corporation for National and Community Service, 1201 New York Avenue, NW., Washington, DC 20525.

The Director of the office that initiated the subject information is to coordinate with such Corporation officials as appropriate to determine whether or not to correct information. The Corporation will correct information and disseminate such corrected information only to the degree and in the manner that the Program Director, in consultation with such Corporation officials as he or she deems appropriate, conclude is appropriate for the nature and timeliness of the information involved. For example, a mass mailing and a press release might be used to correct a widely disseminated error of wide public interest or importance whereas informal communication by letter or telephone might be used for a less widely disseminated inconsequential or trivial error. The Program Director, when appropriate, may determine a request to be inconsequential or trivial. In such a case the Program Director may decide that no response may be necessary.

The correction process is designed to address the genuine and valid needs of the Corporation and its constituents without disrupting Corporation operations. The Corporation, in making a determination of whether or not to correct information, may reject claims made in bad faith or

without justification. The Corporation will explain decisions to deny or limit corrective actions in writing to the affected person and in the annual fiscal year reports to the OMB.

If the affected person requesting a correction does not agree with the Corporation's decision (including the corrective action, if any), the person may petition for reconsideration. The written request for reconsideration should be submitted to the CIO within 60 calendar days of the date of the denial letter. Generally, the CIO in consultation with the Office of General Counsel will review the Corporation's decision and basis thereof and act upon a request for reconsideration within 60 business days. The CIO will notify the appellant whether his or her request was granted or denied and what corrective action, if any, the agency will take.

Again, the 60-day response period described above is to begin on the day the reconsideration request is received. An improperly addressed reconsideration request is to begin on the latter of the day the reconsideration request is received or would have been received with the reasonable exercise of diligence by the CIO. Reconsideration requests shall be made in writing. The envelope and the reconsideration request both should be clearly marked .CIO Information Correction Reconsideration Request. and addressed to: Chief Information Officer, Corporation for National and Community Service, 1201 New York Avenue NW, Washington, DC 20525.

These procedures for correcting information shall apply to information that the Corporation disseminates on or after October 1, 2002, regardless of when the Corporation first disseminated the information.

V. Annual Reports to OMB about Requests to Correct Information

The Corporation is to submit a report annually to the Director of OMB on the number and nature of complaints received by the agency regarding the accuracy of the information it disseminates. The report is to be submitted on an annual fiscal-year basis no later than January 1 of the following year. As appropriate, the report is to contain both quantitative and qualitative information about the complaints received and the resolution of the complaints. The report is to include an explanation of agency decisions to deny or limit corrective action.

The first report will cover Fiscal Year 2003 and is to be submitted to OMB by January 1, 2004.

VI. Definitions

1. "Quality" is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as "quality."
2. "Utility" refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the agency disseminates to the public, the agency needs to consider the uses of the information not only from the perspective of the agency but also from the perspective of the public. As a result, when transparency of information is relevant for

assessing the information's usefulness from the public's perspective, the agency must take care to ensure that transparency has been addressed in its review of the information.

3. "Objectivity" involves two distinct elements, presentation and substance.

- a. "Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. Also, the agency needs to identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific, financial, or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users.
- b. In addition, "objectivity" involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods.
 - i. If data and analytic results have been subjected to formal, independent, external peer review, the information may generally be presumed to be of acceptable objectivity. However, this presumption is rebuttable based on a persuasive showing by the petitioner in a particular instance. If agency-sponsored peer review is employed to help satisfy the objectivity standard, the review process employed shall meet the general criteria for competent and credible peer review recommended by OMB-OIRA to the President's Management Council (9/20/01) (http://www.whitehouse.gov/omb/inforeg/oira_review-process.html), namely, "that (a) peer reviewers be selected primarily on the basis of necessary technical expertise, (b) peer reviewers be expected to disclose to agencies prior technical/policy positions they may have taken on the issues at hand, (c) peer reviewers be expected to disclose to agencies their sources of personal and institutional funding (private or public sector), and (d) peer reviews be conducted in an open and rigorous manner."
 - ii. If an agency is responsible for disseminating influential scientific, financial, or statistical information, agency guidelines shall include a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties.
 - A. With regard to original and supporting data related thereto, agency guidelines shall not require that all disseminated data be subjected to a reproducibility requirement. Agencies may identify, in consultation with the relevant scientific and technical communities, those particular types of data that can practicably be subjected to a reproducibility requirement, given ethical,

feasibility, or confidentiality constraints. It is understood that reproducibility of data is an indication of transparency about research design and methods and thus a replication exercise (i.e., a new experiment, test, or sample) shall not be required prior to each dissemination. The Corporation shall assure reproducibility for those kinds of original and supporting data according to commonly accepted scientific, financial, or statistical standards.

- B. With regard to analytic results related thereto, agency guidelines shall generally require sufficient transparency about data and methods that an independent reanalysis could be undertaken by a qualified member of the public. These transparency standards apply to agency analysis of data from a single study as well as to analyses that combine information from multiple studies.
 - i. Making the data and methods publicly available will assist in determining whether analytic results are reproducible. However, the objectivity standard does not override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections.
 - ii. In situations where public access to data and methods will not occur due to other compelling interests, agencies shall apply especially rigorous robustness checks to analytic results and document what checks were undertaken. Agency guidelines shall, however, in all cases, require a disclosure of the specific data sources that have been used and the specific quantitative methods and assumptions that have been employed. Each agency is authorized to define the type of robustness checks, and the level of detail for documentation thereof, in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible.
- C. With regard to analysis of risks to human health, safety and the environment maintained or disseminated by the agencies, agencies shall either adopt or adapt the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. 300g-1(b)(3)(A) & (B)). Agencies responsible for dissemination of vital health and medical information shall interpret the reproducibility and peer-review standards in a manner appropriate to assuring the timely flow of vital information from agencies to medical providers, patients, health agencies, and the public. Information quality standards may be waived temporarily by agencies under urgent situations (e.g., imminent threats to public health or homeland security) in accordance with the latitude specified in agency-specific guidelines.

4. "Integrity" refers to the security of information -- protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

5. "Information" means any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that an agency disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where the agency's presentation makes it clear that what is being offered is someone's opinion rather than fact or the agency's views.
6. "Government information" means information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
7. "Information dissemination product" means any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, an agency disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.
8. "Dissemination" means agency initiated or sponsored distribution of information to the public (see 5 C.F.R. 1320.3(d) (definition of "Conduct or Sponsor"). Dissemination does not include distribution limited to government employees or agency contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law. This definition also does not include distribution limited to correspondence with individuals or persons, and communications such as press releases, interviews, speeches, and similar statements. Also excluded from the definition are archival records, public filings, responses to subpoenas or compulsory document productions; or documents prepared and released in the context of adjudicative processes.
9. "Influential," when used in the phrase "influential scientific, financial, or statistical information", means that the agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. Each agency is authorized to define "influential" in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible.
10. "Reproducibility" means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For information judged to have more (less) important impacts, the degree of imprecision that is tolerated is reduced (increased). If agencies apply the reproducibility test to specific types of original or supporting data, the associated guidelines shall provide relevant definitions of reproducibility (e.g., standards for replication of laboratory data). With respect to analytic results, "capable of being substantially reproduced" means that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.